

Table of Contents

A Message to all Employees	4
Introduction: Our Expectations and Values	8-10
1. Maintaining an Inclusive, Fair and Healthy Work Environment	11
1.1 Diversity and Equal Opportunity Commitment.....	11
1.2 Discrimination and Harassment.....	11
1.3 Workplace Violence.....	11
1.4 Workplace Safety and Environment	12
1.5 Substance Abuse - Illegal Drugs and Controlled Substances	12
1.5.1 Alcohol	13
1.6 Solicitation and Fundraising	13
1.7 Gambling	13
1.8 Employee Privacy.....	14
1.8.1 Monitoring On the Job.....	14
1.8.2 Use of Recording Devices.....	14
1.9 Misconduct Off the Job.....	14
2. Maintaining Integrity and Fairness in the Workplace.....	15
2.1 Avoiding Conflicts of Interest	15
2.1.1 Personal Conflicts of Interest	15
2.1.2 Employment Outside Verizon.....	15
2.1.3 Activities Outside of Verizon.....	16
2.2 Political Conflicts of Interest	16
2.2.1 Personal Political Interests	16
2.2.2 Contributions of Corporate Assets	16
2.2.3 Seeking Public Office	17
2.3 Insider Trading and Financial Interests.....	17
2.3.1 Investments in Companies with Which You Conduct Business on Verizon's Behalf.....	17
2.3.2 Significant Financial Interests in Companies.....	18
2.3.3 Transactions in Securities	18
2.3.4 Loans	18

3. Protecting Verizon's Assets and Reputation	19
3.1 Preparing, Disclosing and Maintaining Accurate Records	19
3.1.1 Creating Accurate Records	19
3.1.2 Promoting Transparent and Complete Disclosure.....	19
3.1.3 Retaining Company Records	20
3.2 Safeguarding Company Information	20
3.2.1 Protecting Non-public Company Information	20
3.2.2 Acquiring Non-public Company Information of Others	21
3.3 Proper Use of Verizon's Property and Property Owned by Others	21
3.3.1 Company Benefits	21
3.3.2 Company Property and Funds	21
3.3.3 Work Time	21
3.4 Protecting Company Communication and Information Systems	22
3.4.1 Prohibited Activities	22
3.5 Security of Facilities	23
3.6 Intellectual Property	23
3.6.1 Proper Use of Others' Intellectual Property	23
3.6.2 Information of Former Employers	23
3.7 Handling External Communications	24
4. Maintaining Integrity and Fairness in the Marketplace	25
4.1 Customer Relationships	25
4.1.1 Customer Privacy and Communications	25
4.1.2 Customer Marketing	25
4.1.3 Selling with Integrity	26
4.2 The Government as a Customer	26
4.2.1 Court Orders and Other Legal Documents.....	26
4.2.2 Classified and National Security Information	27
4.3 Selecting and Maintaining Relationships with Business Providers	27

4.4 Gifts and Entertainment	27
4.4.1 When Gifts are Appropriate	27
4.4.2 When Entertainment is Appropriate	28
4.4.3 Prohibited Exchanges	28
4.4.4 Gifts Involving Travel or Lodging	28
4.4.5 Returning Gifts	28
4.4.6 Gifts Outside the Workplace	29
4.4.7 Gifts and Entertainment Involving Government Officials	29
4.5 Bribes, Kickbacks and Loans	29
4.6 Relationships with and Obligations of Departing and Former Employees	29
4.7 Interaction with Competitors	30
4.7.1 Avoiding Violations of the Antitrust and Competition Laws	30
4.7.2 Gathering Information About Competitors	32
4.8 Relationships With Affiliates	32
4.9 International Relationships	32
4.9.1 Locating Offices or Receiving Services Outside of the United States	32
4.9.2 Compliance with Screening Requirements of the Office of Foreign Asset Control (OFAC)	33
4.9.3 Import/Export Control	33
4.9.4 Payments, Lobbying, Expenses and Recordkeeping Requirements Globally	34
4.9.5 Economic Sanctions and Embargoes	35
4.9.6 Illegal Boycotts	35
Conclusion	36
Sources of Help	37
Quick Reference Chart	37-38

Introduction¹

Our Expectations and Values

Sustain a Culture of Integrity

This Code of Conduct is a statement of the principles and expectations that guide ethical business conduct at Verizon. Verizon requires all employees to use their judgment, to be accountable for their actions and to conduct business with integrity.

This Code of Conduct reflects our changing business environment and has been approved by the Verizon Board of Directors. In addition to governing conduct by employees, this Code governs conduct between employees and customers, competitors and the numerous business providers (including suppliers, vendors, contractors and agents) who assist Verizon every day. Because we want our business providers, customers and investors to understand how we do business and what they can expect of us, this Code appears on the Verizon website and is available to the public.

You may never violate this Code or any company policy even if a supervisor directs you to do so. If you receive such a request, you should advise your supervisor that the request violates the Code. If your supervisor refuses to modify his or her request, you should contact the VZ Compliance Guideline immediately.

Failure to comply with any provision of this Code or company policy is a serious violation and may result in disciplinary action, up to and including termination of employment, as well as civil or criminal penalties. These consequences may apply not only to employees who commit misconduct, but also to those who condone misconduct, fail to report or take reasonable measures to prevent, detect and address misconduct or seek to retaliate against those who report potential misconduct.

Set the Tone at the Top

Build Trust and Credibility

We earn credibility with our customers, business providers and co-workers by keeping our commitments, acting with honesty and integrity and pursuing our company goals solely through ethical and professional conduct.

If you are a supervisor, you have the added responsibility of creating an open and supportive environment where employees feel comfortable asking questions, raising concerns and reporting misconduct. Ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example.

Great companies are judged by what they do, not by what they say.

We pursue company goals solely through ethical and professional conduct.

-
- Read the Code
 - Understand the Code
 - Utilize Available Resources
 - Comply with the Code

Report all suspected violations of this Code.

VZ Compliance

Guideline

844 VZ GUIDE

844.894.8433 (U.S.)
(+800.0.624.0007
(International)

verizonguideline.com

vzguide@verizon.com

Harassment or discrimination of any kind is not tolerated.

Speak Up

Do the Right Thing Because it's the Right Thing to Do

At Verizon, we have an open door policy. Everyone should feel comfortable speaking his or her mind, particularly with respect to ethical concerns. You must report suspected and actual violations of this Code, company policy and the law. Verizon will investigate reported instances of questionable or unethical behavior.

In deciding whether a violation of the Code has occurred or is about to occur, you should first ask yourself:

- Could this conduct be viewed as dishonest, unethical or unlawful?
- Could this conduct hurt Verizon? Could it cause Verizon to lose credibility with its customers, business providers or investors?
- Could this conduct hurt other people, such as other employees, investors or customers?

If the answer to any of these questions is "yes" or even "maybe," you have identified a potential issue that you must report.

Where to Report

You Are Accountable

Anyone may submit an anonymous or confidential complaint or inquiry by calling the **VZ Compliance Guideline** or going on-line at verizonguideline.com. If you have questions regarding any of the laws discussed in this Code, you should contact the Legal Department.

Imminent Danger or Illegal Conduct

You must immediately report any instance of violence, hostile behavior, possession of weapons or any component of a weapon on company property, or related illegal conduct to Security and a supervisor. In cases of imminent danger, you should contact 911 or local law enforcement first, and then contact Security at **800.997.3287** (U.S.) or **972.615.4343** (International).

Discrimination or Harassment

If you believe you are a victim of or a witness to discrimination or harassment, you must report it to your supervisor, Human Resources or make a confidential contact to the VZ Compliance Guideline. If your complaint is about your supervisor or you are otherwise uncomfortable reporting your complaint to him or her, you should report it directly to Human Resources or the VZ Compliance Guideline. You may also address suspected discrimination or harassment directly with the person engaging in such conduct if you are comfortable doing so and you believe the conduct is unintentional.

Accounting, Internal Accounting Controls or Auditing Complaints

You must report any concerns or questions you have about the accuracy or integrity of Verizon's financial statements, reporting, accounting, internal accounting controls or auditing matters to Internal Audit at AccountingComplaints@verizon.com or to the VZ Compliance Guideline.

Confidential Reporting and No Retaliation

Reports and complaints will be kept confidential to the extent permitted by law and by the company's need to investigate the situation.

Verizon prohibits retaliation against employees for submitting or participating in the investigation of any complaints. If you believe you or others are the subject of retaliation for reporting suspected misconduct or participating in an investigation, you must report the matter to the VZ Compliance Guideline or the Legal Department.

Cooperation with Investigations

You must cooperate completely in any investigation relating to Verizon. You must be honest and forthcoming at all times during an investigation, and you must provide any investigator with full, accurate, timely and truthful information. Misrepresenting facts or failing to disclose facts during an investigation is strictly prohibited. You may never interfere with or obstruct an investigation conducted by the company, by any third party on the company's behalf or any government agency.

If a police officer, other law enforcement personnel or government employee from any agency (except for environmental, health and safety agencies which are addressed in Section 1.4 of the Code) requests access to company premises or to company or customer information, you must immediately notify the Legal Department for appropriate guidance. Any documents, information or testimony you provide in response to a request by a government agency must be full, fair, accurate and timely, and reviewed in advance by the Legal Department. If you discover or suspect any misrepresentation, misstatement, misunderstanding, omission or other mistake by yourself or another employee, you must immediately disclose it to the Legal Department so that the company can take prompt steps to remedy the situation. The requirements of this subsection do not apply to providing information or testimony, in your individual capacity, to a governmental body or agency on behalf of yourself or co-workers where protected by applicable law.

A Quick Reference Chart with all the important contact information appears at the end of this Code.

You must adhere to the Code of Conduct and fully cooperate with all investigations relating to Verizon.

Verizon will not tolerate retaliation against employees for reporting suspected misconduct or providing information as part of an investigation.

¹ You are required to comply with this Code as a condition of continued employment. This Code does not give you rights of any kind, and may be changed by the company at any time without notice to you. Employment with Verizon is "at will," which means that you or Verizon may terminate your employment, at any time, with or without cause, with or without notice, for any reason not prohibited by law, unless governed by a collective bargaining agreement or specific contract of employment. This at will employment relationship may not be modified except in a written agreement signed by an authorized Verizon officer. This Code sets forth policies and practices applicable to all Verizon employees.

Section



You must treat all customers, fellow employees and vendors with respect, dignity, honesty, fairness and integrity.

Diverse minds, experiences, cultures and perspectives help us better serve our customers.

You may never view or display any pornographic, obscene or offensive material through company systems, on company or customer premises or in company vehicles.

Q. My supervisor requires the team to meet attendance targets and quality goals. Every month there is another requirement. Isn't this harassment?

A. It is not considered harassment for management to enforce job performance requirements in a fair and consistent manner.

Maintaining an Inclusive, Fair and Healthy Work Environment

Verizon employees must act with fundamental honesty and integrity in all company dealings, comply with all laws that govern our business, maintain an ethical and professional work environment and comply with all company policies. Verizon employees are required to treat customers, fellow employees and vendors with respect, dignity, honesty, fairness and integrity.

1.1 Diversity and Equal Opportunity Commitment

At Verizon, diversity means embracing differences and promoting an inclusive organization that values the diversity of employees, customers, suppliers and community partners because it's the right thing to do and drives business success.

Verizon is committed to attracting, developing and retaining a highly qualified, diverse and dedicated work force. It is Verizon's policy to comply fully with all laws providing equal opportunity to all persons without regard to race, color, religion, age, gender, sexual orientation, gender identity and expression, national origin, disability, marital status, citizenship status, veteran status, military status or any other protected category under applicable law. For company business, Verizon will use facilities, sponsor events or maintain memberships only at businesses or organizations that do not have exclusionary membership practices.

1.2 Discrimination and Harassment

Verizon has a policy of zero tolerance for discrimination, sexual harassment or other harassment based on race, color, religion, age, gender, sexual orientation, gender identity and expression, national origin, disability, marital status, citizenship status, veteran status, military status or any other protected category under applicable law. Harassment includes but is not limited to, racist, sexist or ethnic comments, jokes or gestures, or any conduct or statement creating an intimidating, hostile or offensive work environment.

Any unlawful discrimination or harassment must be brought to the attention of your supervisor, Human Resources or the VZ Compliance Guideline. If your complaint is about your supervisor or you are otherwise uncomfortable reporting your complaint to him or her, you should report it directly to Human Resources or the VZ Compliance Guideline. You may also address suspected discrimination or harassment directly with the person engaging in such conduct if you are comfortable doing so and you believe the conduct is unintentional.

1.3 Workplace Violence

Verizon will not tolerate any threatening, hostile or abusive behavior in the workplace, while operating company vehicles or on company business, or by any persons on company property, and will take immediate and appropriate action against offenders, up to and including termination of employment and referral for criminal prosecution. Nor will Verizon tolerate threatening, hostile or abusive conduct directed at employees or customers by Verizon personnel at any time or place. Damage to property is also prohibited.

Unless local law expressly permits possession of a weapon in a locked personal vehicle on company property, you may not possess or use any weapon or any component of a weapon (e.g. ammunition) on company property. You must report any instance of violence, hostile behavior or possession of weapons on company property to Security and a supervisor immediately. In cases of imminent danger, you should contact 911 or local law enforcement first, and then contact Security.

Domestic violence can also adversely affect workplace safety. If you are the victim of such violence, you should notify the police and Security of any person who may affect your safety or the safety of your fellow employees. You can also contact the Employee Assistance Program for further assistance (see Quick Reference Chart for contact information on pages 37-38).

1.4 Workplace Safety and Environment

Verizon is committed to providing a safe workplace for all employees and meeting its environmental responsibilities. You must perform your job in a safe and environmentally responsible manner in compliance with applicable Verizon policies and practices and the law.

If you believe that a safety, health or environmental hazard exists, that there has been a release of any hazardous substance, or that safety, health or environmental guidelines are not being followed, you must immediately report the situation to your supervisor. Where you are unable to reach your supervisor directly or there has been a release or imminent release of any hazardous substance, you must also immediately contact the safety and environmental management organization at **800.386.9639**.

If you are a supervisor, you must also ensure that your direct reports are trained on the safety and environmental practices applicable to each of their jobs and implement and enforce all applicable regulations and policies. You must investigate all safety, health and environmental issues that come to your attention, and refer any issues of potential noncompliance to your supervisor and the safety and environmental management organization.

If you believe that your supervisor has failed to take appropriate action to remedy a condition which is unsafe or in violation of any law or safety, health and environmental practice, you must contact a representative of the safety and environmental management organization.

Verizon is required to record and report work-related accidents. If you are involved in a work-related accident, you must immediately report it to a supervisor and follow the company's policies for reporting accidents and injuries.

Government agencies may conduct periodic inspections for compliance with safety, health and environmental requirements. If officials of any governmental agency seek to conduct an inspection, you must immediately contact and consult with a company representative in the safety and environmental management organization.

1.5 Substance Abuse—Illegal Drugs and Controlled Substances

Verizon is committed to maintaining a safe and drug-free environment for all its employees. While on company time, company premises, or while operating company equipment or vehicles, you may never use, transfer, sell, manufacture or possess illegal drugs (which means any controlled substances under Schedule I of the Controlled Substances Act—which includes marijuana—and any other controlled substances that have not been prescribed for you by your doctor) or drug paraphernalia. You may not report to work under the influence of any illegal drug, or if testing would demonstrate that you have used or consumed an illegal drug.

Perform your job in a safe and environmentally responsible manner.

Q. I am attending a work related conference. During the evening welcoming reception alcohol is served. Can I drink alcoholic beverages at this event?

A. Yes, but consumption must be in moderation to avoid intoxication as you are representing Verizon and must behave professionally. However, employees driving company vehicles are prohibited from consuming any alcohol. You should never drink and drive.

Internal drawings promoting company products and services or team building are allowed when voluntary and involve no monetary transactions.

If you are taking any medication that creates a safety risk, you must report this to your supervisor, and you must not operate any Verizon machinery or vehicle if the medication affects your perception or responsiveness.

You must immediately report any arrest or charge pending final resolution or conviction for a drug-related offense to the VZ Compliance Guideline so that the company may determine whether this may affect your ability to perform your job or otherwise affect the company's business interests.

1.5.1 Alcohol

You may not possess, serve, be under the influence of, or drink alcohol while on company property, while in a company vehicle or while conducting business for Verizon. The only exceptions are for Verizon functions where alcohol may be served only with prior approval from a vice president level or above supervisor, or external events at which you are representing Verizon. Although alcohol may be served at such events, consumption is completely voluntary, should always be in moderation, and never in a manner that would embarrass or harm the company.

You must immediately report to the VZ Compliance Guideline any arrest or charge pending final resolution or conviction for an alcohol-related offense relating to conduct while on company property or business or that may otherwise affect your ability to perform your job, or otherwise affect the company's business interests.

1.6 Solicitation and Fundraising

Solicitation and fundraising distract from work time productivity, may be perceived as coercive and may be unlawful.

Solicitation during work time (defined as the work time of either the employee making or receiving the solicitation), the distribution of non-business literature in work areas at any time or the use of company resources at any time (emails, fax machines, computers, telephones, etc.) to solicit or distribute, is prohibited. Non-employees may not engage in solicitation or distribution of literature on company premises. The only exception to this policy is where the company has authorized communications relating to benefits or services made available to employees by the company, company-sponsored charitable organizations or other company-sponsored events or activities. To determine whether a particular activity is authorized by the company, contact the VZ Compliance Guideline.

Fundraising and philanthropic initiatives that refer to or use the Verizon name, or that are organized by or directed to Verizon employees in the workplace, must be conducted by the Verizon Foundation, and must conform to all company standards, including this Code.

This section does not apply to political activities (addressed separately in section 2.2 of this Code) undertaken on Verizon's behalf in coordination with the Public Policy, Law and Security Department or activities conducted pursuant to the Employee Resource Group Guidelines.

1.7 Gambling

You may not gamble or participate in any games of chance (including raffles, sports pools or lotteries) on company premises, on company systems or while conducting company business.

1.8 Employee Privacy

You must take appropriate steps to protect confidential personal employee information, including social security numbers, identification numbers, passwords, bank account information and medical information. You should never access or obtain, and may not disclose outside of Verizon, another employee's personal information obtained from Verizon business records or systems unless you are acting for legitimate business purposes and in accordance with applicable laws, legal process and company policies, including obtaining any approvals necessary under those policies.

1.8.1 Monitoring On the Job

In order to protect company assets, provide excellent service, ensure a safe workplace, and to investigate improper use or access, Verizon monitors employees' use of Verizon's communications devices, computer systems and networks (including the use of the Internet and corporate and personal web-based email accessed from Verizon devices or systems), as permitted by law. In addition, and as permitted by law, Verizon reserves the right to inspect, monitor and record the use of all company property, company provided communications devices, vehicles, systems and facilities—with or without notice—and to search or monitor at any time any and all company property and any other personal property (including vehicles) on company premises.

Verizon reserves the right to inspect, monitor and record the use of all company property and systems.

1.8.2 Use of Recording Devices

In many jurisdictions, use of recording devices without the consent of both parties is unlawful. Unless you are participating in an approved observation program or you have obtained prior approval from Security or the Legal Department, you may not record, photograph, or videotape another employee while the employee is at work or engaged in business activities or access another employee's systems, records or equipment without that employee's knowledge and approval. In addition, unless you receive prior approval from the Legal Department, you may never record, photograph or videotape any customer, business provider or competitor without that person's knowledge and approval.

1.9 Misconduct Off the Job

Employees must avoid conduct off the job that could impair work performance or affect the company's reputation or business interests.

In order for the company to determine whether off the job conduct could impair work performance or affect the company's reputation or business interests, you must promptly report to the VZ Compliance Guideline: (1) any arrest or charge pending final resolution or conviction for any felony (or state or local law felony equivalent); (2) any arrest or charge pending final resolution or conviction for a crime involving dishonesty, assault or battery; or (3) any other arrest or charge pending final resolution or conviction which may affect your ability to perform your job or otherwise affect the company's business interests.

Section

2

Q. I am dating a co-worker who is being promoted to supervisor of our team. Do we have to bring this to the attention of our manager?

A. Yes. This situation would create a conflict of interest in your group. Even if you and your colleague are currently equals in the same group, you should advise your manager of the relationship to prevent an inappropriate reporting relationship.

Q. I need to make extra money and I want to get a second job. Is this a problem?

A. This may create a conflict of interest if your second job provides any of the same types of services or products as Verizon, compromises Verizon's interests or adversely affects your job performance.

Maintaining Integrity and Fairness in the Workplace

Verizon's reputation depends heavily on the actions and integrity of its employees. It is imperative that you avoid any relationships or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. You owe a duty to Verizon to advance its legitimate interests when the opportunity to do so arises. You must never use Verizon property or information for personal gain or take personal advantage of any opportunity that arises in the course of your work for Verizon.

2.1 Avoiding Conflicts of Interest

You must disclose any potential or actual conflict to the VZ Compliance Guideline. This chapter addresses some of the most common conflicts.

2.1.1 Personal Conflicts of Interest

You may not supervise someone with whom you share a close personal relationship, such as anyone in your family or household, someone with whom you have or had a romantic relationship or other close personal relationship. Nor may you participate in the selection process for, or supervise Verizon's relationship with, a company that does business with Verizon if it employs someone with whom you have such a close personal relationship or is a company with which you have a business relationship.

If you supervise someone, even indirectly, with whom you have one of the relationships described above, or if you have such a relationship with an employee of a company that does business with Verizon, you must disclose the relationship promptly to the VZ Compliance Guideline. In addition, you should not use your position at the company to advance your personal interests or those of a friend or relative at the expense of the company's interests.

2.1.2 Employment Outside Verizon

You may not—with or without compensation—be self-employed or employed by, consult with, own, perform services for or aid a company or organization (including a charitable organization) that is a vendor, supplier, contractor, subcontractor or competitor of Verizon, or that provides services that are provided by Verizon, or that Verizon is seeking to provide (examples of such services may include communications, cable, video, entertainment or information management, long-distance, Internet, network security, software or repair or service of computers, telephones or televisions). Outside work should not interfere with your work for Verizon. This limitation also applies to simultaneous employment by Verizon and its subsidiaries, affiliates and joint ventures in which Verizon maintains an ownership interest.

Exceptions to the requirements of the previous paragraph may be granted only upon written approval by the Ethics Office.

Unless you receive the prior written approval of your supervisor and Human Resources, you may not engage in any outside employment or self-employment or perform any commercially-related services—with or without compensation—while absent from work on any company-approved leave of absence, absence due to sickness or disability, Family Medical Leave or comparable leave provided for by applicable law.

2.1.3 Activities Outside of Verizon

Many employees participate in an individual capacity in outside organizations (such as their local school board or homeowners' association). Memberships in these associations can cause conflicts if they require decisions regarding Verizon or its products. If you are a member of an outside organization, you must remove yourself from discussing or voting on any matter that involves the interests of Verizon or its competitors. You must also disclose this conflict to your outside organization without disclosing non-public company information and you must disclose any such potential conflict to the VZ Compliance Guideline. Participation in any outside organization should not interfere with your work for Verizon. To the extent that your participation infringes on company time or involves the use of Verizon resources, your supervisor's approval is required.

If you serve or are seeking to serve as a representative of Verizon on a board or committee of any outside organization, you must obtain the prior approval of your vice president level or above supervisor, and the Ethics Office.

If you serve on a Board of Directors of a public corporation, you must obtain prior approval from both your vice president level or above supervisor and your organization's president or executive vice president, and the Ethics Office. Service on the Board of Directors of a non-public corporation must be approved by the Ethics Office.

2.2 Political Conflicts of Interest

Verizon encourages its employees to participate in the political process. It is the responsibility of every Verizon employee to comply fully with all laws and regulations relating to interactions with government officials, including laws governing campaign finance, government ethics and lobbying. In addition, all lobbying activities on behalf of the company must be authorized by the Public Policy, Law and Security Department.

2.2.1 Personal Political Interests

Your personal political contributions and activities must be kept separate from the company. If you make political contributions, you may not refer in any way to your employment or use the company's assets, including its name, in connection with your contributions, unless required to do so by law.

If you are appearing before a government body or engaging in contact with a public official outside of your ordinary work duties regarding a business in which Verizon is engaged or a business issue in which Verizon has an interest, you should make it clear that you are not representing Verizon, and you should advise your supervisor in advance.

2.2.2 Contributions of Corporate Assets

You may not make payments of corporate contributions, whether monetary or non-monetary assets, to any domestic or foreign political party, candidate, campaign or public official unless that contribution is permitted under applicable laws inside and outside the U.S., and approved in advance by the Public Policy, Law and Security Department. In addition, you may never reimburse anyone for any political contribution.

Acting as a representative of Verizon means that you are authorized to speak on Verizon's behalf. Otherwise, you are acting independently and Verizon's name should not be used in connection with your participation.

Q. When I receive e-mails advising me how I may contact my Congressperson about certain telecommunications laws, am I required to do so?

A. Your involvement in the political process is purely voluntary.

Verizon and its subsidiaries administer Political Action Committees (PACs) that accept contributions from employees who wish to support the political process in a way that identifies Verizon, as permitted by law. Your personal contributions to these PACs are entirely voluntary.

2.2.3 Seeking Public Office

Before you seek any elected or appointed public office, including a local position, such as school board president, you must obtain the approval of your director level or above supervisor and the Legal Department.

2.3 Insider Trading and Financial Interests

Insider trading occurs when a person trades in a company's securities using material inside information—that is, information that is not publicly available and that could reasonably affect a person's decision about whether to buy or sell the securities. It also occurs when a person gives material inside information to someone else who trades on it. Insider trading is a serious violation of the law and can result in severe civil or criminal penalties, including imprisonment.

As a Verizon employee, you may become aware of material inside information about Verizon or other companies with which Verizon does business. You must never use material inside information (even if you acquired it as a "tip" from others) to trade in Verizon's or any other company's securities. This prohibition also includes trading in derivative securities, such as calls and puts, and engaging in short selling or other hedging transactions. In addition, you may not provide material inside information to any other person, including members of your family or your friends, or assist any other person in buying, selling or entering into any other transaction using material inside information.

The rules that relate to insider trading are complex. If you are not sure whether these restrictions apply to you, you should consult the Legal Department before making any decision to buy, sell or trade in a security, or before you disclose any information to another person. As a general rule, non-public information concerning a company's business, financial prospects, regulatory or legal matters, or management issues, is often considered "material."

2.3.1 Investments in Companies with Which You Conduct Business on Verizon's Behalf

If you conduct or supervise business on Verizon's behalf with a company, you must not transact any business in that company's securities or derivatives of those securities. If you already own stock in a company, and your position at Verizon requires you to conduct or supervise business with this company, you must disclose your ownership interest to a vice president level or above supervisor, and seek approval from the Legal Department prior to trading in that company's securities.

You should never trade or help others trade on information that may be viewed as material inside information.

Q. I have been asked to participate in an investor expert network as a tech industry professional. This expert network does research to assist investors. If I do not reveal any confidential Verizon information, can I participate?

A. Employees and executives are generally prohibited from participating in expert networks for investors due to insider trading concerns. You should consult with the Ethics Office regarding this request.

2.3.2 Significant Financial Interests in Companies

You may not take a significant financial interest in a company that is a business provider or that competes with or is in one of the same lines of business as Verizon. A significant financial interest is any financial interest that: (a) is more than 1/10 of one percent of a company's publicly traded securities or other financial instruments and (b) exceeds 25 percent of an employee's Verizon annual base salary and bonuses.

2.3.3 Transactions in Securities

You must not engage in any financial transaction that permits you to benefit from the devaluation of Verizon's stocks, bonds or other securities, including, but not limited to, short selling or buying "put" options on Verizon stock.

In addition, you may not participate in financial transactions in the stock or other securities of business providers or prospective business providers, including "friends and family" deals or initial public offerings (IPOs), if these opportunities may influence, or appear to influence, your business judgment on behalf of Verizon.

2.3.4 Loans

Personal loans from the company to any executive officer (as defined by securities law) are unlawful and strictly prohibited. Personal loans from the company to any other employee must be approved in writing in advance by the Legal Department or in accordance with an approved Verizon program. Loans greater than \$25 between employees who are in a direct or indirect reporting relationship are prohibited.

Q. My supervisor is experiencing a personal emergency and I offered a loan of \$200 until the next pay period. Is this a concern?

A. Yes, loans greater than \$25 between employees who are in a direct or indirect reporting relationship are prohibited.

Section

3

No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Always report information accurately and promptly resolve discrepancies in company records. Verizon's reputation is a key asset that all employees must protect.

Protecting Verizon's Assets and Reputation

3.1 Preparing, Disclosing and Maintaining Accurate Records

Verizon is committed to maintaining and providing truthful information that fully satisfies applicable legal requirements, including the Sarbanes-Oxley Act of 2002.

3.1.1 Creating Accurate Records

You must create accurate records that reflect the true nature of the transactions and activities that they record (including, but not limited to, reporting of time, documenting attendance and absence, productivity, commissions and quality assurance). You must resolve discrepancies in any records and make appropriate corrections. If you suspect or learn that records are misleading or contain errors, you must promptly inform either your supervisor or the VZ Compliance Guideline and, if applicable, customers and business providers. Because even a minor error can affect the truthfulness of a record, you must report all errors, regardless of their size or how long ago they may have occurred. If your supervisor fails to address a report about a record's accuracy, you must report your concern to Internal Audit or the VZ Compliance Guideline.

Verizon does not tolerate falsification or improper alteration of records. It is never appropriate to direct someone else to prepare or approve a false or misleading record and it is no defense to say that someone else directed you to make a record that you knew or had reason to suspect was false or misleading. It is also improper to intentionally take any action that leads to the creation of false or misleading records, such as withholding information from, or providing incomplete information to, someone who is preparing a record. If you believe that a record was intentionally falsified or created to be misleading, you must contact Internal Audit or the VZ Compliance Guideline.

3.1.2 Promoting Transparent and Complete Disclosure

Verizon is committed to transparency in financial reporting to enhance investors' understanding of the company's business and to facilitate informed investment decisions. All disclosures made in financial reports and public documents filed with the Securities and Exchange Commission, and other public communications, must be full, fair, timely, accurate and understandable.

You must not selectively disclose (whether in one-on-one or small discussions or meetings) any material information regarding Verizon, its securities, business operations, plans, financial condition, results or any development or plan. You should be particularly careful not to disclose such information if you make presentations or proposals to customers, business providers, investors or to any other third party.

To ensure accurate reporting, Verizon employs both internal and outside auditors. You must cooperate with and provide any auditor or investigator accurate, timely and truthful information. You must not improperly influence, manipulate or mislead any auditor or investigator. Failure to cooperate with any audit or related investigation will result in discipline, up to and including termination of employment.

3.1.3 Retaining Company Records

Company records must be retained according to applicable laws, Verizon's Records Management Policy and the Verizon Records Retention Schedule (vzweb2.verizon.com/node/10949), which are accessible to employees on the Corporate Policy section of the Verizon VZWeb. You may never destroy, alter, mutilate or conceal any record if you have been directed to retain it or if you know—or reasonably believe there is a possibility—of any litigation or any internal or external investigation concerning that record. If any person directs you to violate this policy, you must immediately contact the Legal Department or Security and use all reasonable measures to protect the record.

3.2 Safeguarding Company Information

You must protect company information, both non-public information, that includes "inside information" (information that could reasonably lead a person to buy, sell or hold Verizon's or another company's securities) and non-public information entrusted to Verizon (such as an unlisted telephone number, marketing presentations or correspondence), as well as publicly available information in which Verizon or others have intellectual property rights (such as copyrighted materials).

3.2.1 Protecting Non-public Company Information

You must safeguard non-public company information by following company policies and procedures and contractual agreements for identifying, using, retaining, protecting and disclosing this information.

You may not release non-public company financial information to the public or third parties unless specifically authorized by Verizon's Controller.

You may not release other non-public company information to the public, third parties or Internet forums (including blogs or chat rooms) unless you are specifically authorized to do so by a vice president level or above supervisor, and the Public Policy, Law and Security Department.

You may only disclose non-public company information to employees who have demonstrated a legitimate, business-related need for the information.

Even after the company releases information, you should be mindful that related information may still be non-public and must be protected.

Your obligation to safeguard non-public information continues after your employment with the company terminates. Without Verizon's specific written prior authorization, you may never disclose or use non-public company information.

If you suspect or are aware of any improper disclosure of non-public company information, you must immediately report it to Security or the VZ Compliance Guideline.

You must comply with all company policies relating to the encryption of sensitive information. For example, all company laptops must be encrypted, and you must encrypt files containing sensitive information prior to sending them via email.

Q. During my commute to the office on the train, I sometimes make work-related calls. Is this a problem?

A. You must be careful not to discuss non-public company information in public places, such as in taxis, trains, elevators or at conferences and trade shows. When it is necessary to conduct a telephone call in a public place, be mindful of your surroundings.